

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
ON APPEAL FROM THE EXAMINER TO THE BOARD  
OF PATENT APPEALS AND INTERFERENCES**

In re Application of: Richard H. Harvey, et al.  
Serial No.: 10/648,595  
Filing Date: August 25, 2003  
Group Art Unit: 2164  
Examiner: Alicia M. Lewis  
Confirmation No.: 4259  
Title: WEB SERVICES APPARATUS AND METHODS

**MAIL STOP APPEAL BRIEF - PATENTS**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, Virginia 22313-1450

Dear Sir:

**REPLY BRIEF**

Pursuant to 37 C.F.R. § 1.193, Appellants respectfully file this Reply Brief in response to the Examiner's Answer dated August 24, 2009.

**Arguments**

Appellants filed an Appeal Brief on December 2, 2008, explaining clearly and in detail why Claims 1-17 and 19 are allowable over the prior art cited by the Examiner in the Final Office Action dated May 16, 2008. Specifically, Appellants demonstrated the impropriety of the proposed *Elmore-Gadbois-Moran* combination. Additionally, Appellants demonstrated that at least independent Claims 1 and 8 and dependent Claims 7 and 14 are allowable over the proposed *Elmore-Gadbois-Moran* combination.

While Appellants appreciate the Examiner's thoughtful consideration of this case and the Examiner's thorough response in the Examiner's Answer dated August 24, 2009, Appellants respectfully submit that these rejections continue to be improper and should be reversed by the Board.

**I. Claims 1-6, 8-13, and 15-20 are Allowable over the Proposed *Elmore-Gadbois-Moran* Combination**

In the Appeal Brief, Appellants demonstrated that the proposed *Elmore-Gadbois-Moran* combination does not disclose, teach, or suggest the combination of elements recited in Appellants' claims.

**A. The proposed *Elmore-Gadbois-Moran* combination does not disclose, teach, or suggest “*matching a distinguished name associated with the user and at least a portion of the distinguished name associated with the object*”**

For example, Appellants demonstrated that the proposed *Elmore-Gadbois-Moran* combination does not disclose, teach, or suggest “matching a distinguished name associated with the user and at least a portion of the distinguished name associated with the object,” as recited in Claim 1. In the *Examiner's Answer*, the Examiner continues to point to the *Moran* for disclosure of matching a user ID from authenticated credentials against the object's ACL entries. (*Examiner's Answer*, page 9). Specifically, the Examiner contends that *Moran* discloses that an ACL entry includes “an identifier of the type (i.e., ID of the user)” and that this type is matched with the name of the user. (*Examiner's Answer*, page 10). Appellants continue to respectfully disagree.

As stated in the Appeal Brief, *Moran* discloses that “Access Control Lists (ACLs) are used to describe the permitted actions (permissions) on protected network computer system resources or objects associated with a client or user identity.” (*Moran*, Abstract). Specifically, *Moran* discloses that an ACL policy includes “user and group designations, and their specific permissions.” (*Moran*, page 4, paragraph 70). Accordingly, *Moran* merely discusses storing in a central database a list that identifies a user by user name and associates with the user name the objects that the user has permission to access. For modification of an object by a user, *Moran* discloses that the “user ID From the authenticated credentials is matched (91) with the requested protected object’s ACL entries.” (*Moran*, page 6, paragraph 115). Thus, according to the disclosure of *Moran*, the Authorization Service receives a user request identifying a user by a user name and a requested object. (*Moran*, page 3, paragraphs 46-47). Then, “the userID from the authenticated credentials is matched (91) with the requested protected object’s ACL entries.” (*Moran*, page 6, paragraph 115). Thus, the Authorization Service looks up the user name in the ACL, which is stored in a centralized database. “The permissions granted (93) are those in the matching entry or entries.” (*Moran*, page 6, paragraph 115).

As such, the “matching” referred to in *Moran* merely includes using a list to associate an object with a user to give that user permission to access the object. Specifically, the name of the requested object is used to pull up the ACL list for that object. The user’s name in the request is then matched with an entry in the list that includes the user’s name. Appellants respectfully submit that accessing a list that includes a user name and a user object to which that user has access is not analogous to “matching a distinguished name associated with the user and **at least a portion of the distinguished name associated with the object**,” as recited in Claim 1. There is no disclosure in *Moran* that one would be able to match the name of the user with at least a portion of **the name of the object**. Rather the name of the object is merely used to pull up the appropriate ACL list.

As an example, *Moran* describes the credentials and an authorization request for Bill Smith of ABC Corporation. (*Moran*, page 3, paragraphs 46-47). In the example, Bill Smith attempts to “modify” a protected system file “ABC\_401k\_summaries.” The request includes “B\_Smith, ABC\_employees, “modify”, “ABC\_401k\_summaries”. Thus, the name of the user is “Bill Smith” or “B\_Smith” and the name of the file is “ABC\_401k\_summaries.” The name of the file “ABC\_401k\_summaries” does not include the name of the user and cannot

be matched with “B\_Smith.” Rather, the name of the file, “ABC\_401k\_summaries” is used to pull up an ACL list for that file. It is then determined if “B\_smith” is listed as having access to the file. Accordingly, *Moran* merely discloses matching the name of the user, as presented in the request, with the name of the user, as presented in the ACL list for the object. The proposed *Elmore-Gadbois-Moran* combination does not disclose, teach, or suggest “matching a distinguished name associated with the user and **at least a portion of the distinguished name associated with the object,**” as recited in Claim 1.

**B. The proposed *Elmore-Gadbois-Moran* combination does not disclose, teach, or suggest “*providing the user access to the object in response to matching the distinguished name associated with the object and the distinguished name associated with the user*”**

As at least a second point of error, Appellants demonstrated that the proposed *Elmore-Gadbois-Moran* combination does not disclose, teach, or suggest “providing the user access to the object in response to matching the distinguished name associated with the object and the distinguished name associated with the user,” as recited in Claim 1. In the *Examiner’s Answer*, the Examiner continues to point to *Moran* for disclosure of matching a user ID from authenticated credentials against the object’s ACL entries. (*Examiner’s Answer*, page 10). For reasons similar to those discussed above in Section II(A) of this Reply Brief, Appellants respectfully disagree.

As discussed above, *Moran* discloses that “Access Control Lists (ACLs) are used to describe the permitted actions (permissions) on protected network computer system resources or objects associated with a client or user identity.” (*Moran*, Abstract). Specifically, *Moran* discloses that an “ACL policy is made up of one or more entries that include user specific permissions or rights” and is used to “provide the Authorization Service with information to make a “yes” or “no” answer on a specific request to access a protected object, and to perform some operation on that object.” (*Moran*, page 3, paragraph 62). Thus, according to *Moran*, a list that identifies a user by user name and associates with the user name the objects that the user has permission to access is stored in a central database. Accordingly, when a request is received, the name of the requested object is used to pull up the ACL list for that object. The user’s name in the request is then matched with an entry in the list that includes the user’s name. Accordingly, *Moran* merely discloses matching the name of the user, as presented in the request, with the name of the user, as presented in the ACL list for the object.

Because *Moran* does not disclose that one would be able to match the name of the user with at least a portion of the name of the object, *Moran* is deficient with respect to Applicant's claim language. Specifically, because *Moran* and the proposed *Elmore-Gadbois-Moran* combination does not disclose, teach, or suggest matching a distinguished name associated with the user and **at least a portion of the distinguished name associated with the object**, the proposed combination also cannot be said to disclose, teach, or suggest "providing the user access to the object **in response to matching the distinguished name associated with the object and the distinguished name associated with the user**," as recited in Claim 1.

### C. Conclusion

For these reasons, Appellants continue to submit that Claim 1, together with Claims 2-6 and 17-18 that depend on Claim 1, are allowable over the proposed *Elmore-Gadbois-Moran* combination. Similar to Claim 1, independent Claim 8 recites "code for matching a distinguished name associated with the user and at least a portion of the distinguished name associated with the object" and "code for providing the user access to the object in response to matching the distinguished name associated with the object and the distinguished name associated with the user" and "code for modifying the object as requested by the user in response to the user accessing the object." As such, for at least those reasons discussed above with regard to Claim 1, Claim 8, together with Claims 9-16 and 19-20 that depend on Claim 8, is also patentably distinguishable from and allowable over the proposed *Elmore-Gadbois-Moran* combination.

## II. Claims 7 and 14 are Allowable over the Proposed *Elmore-Gadbois-Moran* Combination

In the Appeal Brief, Appellants demonstrated that the proposed *Elmore-Gadbois-Moran* combination does not disclose, teach, or suggest the combination of elements recited in Appellants' claims. Specifically, Appellants demonstrated that the proposed *Elmore-Gadbois-Moran* combination does not disclose, teach, or suggest "providing a Distinguished Name of an object revealing a chain of ownership and control for the object," as recited in Claim 7. In the *Examiner's Answer*, the Examiner continues to rely specifically upon the

disclosure of *Gadbois* for the recited operation. (*Examiner's Answer*, page 6). Appellants continue to respectfully disagree.

*Gadbois* discloses that within a DIT, “[a] first tier or set of nodes coupled to the host node include a set of nodes representative of organizations.” (*Gadbois*, page 3, paragraph 27). Beneath the organization nodes, the DIT includes “a number of interior sub-nodes which contain further information, or links to further information, regarding the respective organization.” (*Gadbois*, page 3, paragraph 28). As illustrated in Figure 2, these sub-nodes include “Groups,” “Business Services,” and “Publisher Assertions” associated with the Organization. However, while *Gadbois* discloses that nodes are organized by organization there is no disclosure in *Gadbois* that **a distinguished name of an object** reveals the chain of ownership and control for the object. For example, there is no disclosure that the Distinguished Names of each of “Groups,” “Business Services,” or “Publisher Assertions” specifically reveal the ownership and control for those objects. In fact, *Gadbois* is silent as to the naming of the of the sub-nodes. Accordingly, *Gadbois* and the proposed *Elmore-Gadbois-Moran* combination does not disclose, teach, or suggest “providing a Distinguished Name of an object revealing a chain of ownership and control for that object,” as recited in Claim 7.

### Conclusion

For these reasons, Appellants continue to respectfully submit that Claim 7 is allowable over the proposed *Elmore-Gadbois-Moran* combination. Similar to Claim 7, dependent Claim 14 recites “code for providing a Distinguished name of an object revealing a chain of ownership and control for the object.” As such, for at least those reasons discussed above with regard to Claim 7, Claim 14 is also patentably distinguishable from and allowable over the proposed *Elmore-Gadbois-Moran* combination.

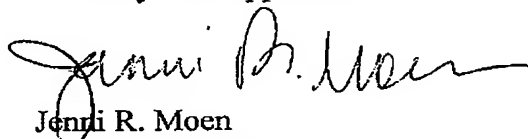
**CONCLUSION**

Appellants have demonstrated that the present invention, as claimed, is clearly distinguishable over the prior art cited by the Examiner. Therefore, Appellants respectfully request the Board to reverse the final rejections and instruct the Examiner to issue a Notice of Allowance with respect to all pending claims.

No fees are believed due; however, the Commissioner is authorized to charge any additional fees or credits to Deposit Account No. 02-0384 of Baker Botts, L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P.  
Attorneys for Appellants

A handwritten signature in black ink, appearing to read "Jenni R. Moen", is written over the printed name.

Jenni R. Moen  
Reg. No. 52,038  
(214) 415-4820

Dated: October 22, 2009

**Correspondence Address:**

at Customer No.

**05073**